

FILED

2017 SEP 11 PM 1:05

UNITED STATES DISTRICT COURT

for the

District of Vermont

United States of America

)

v.

)

Brian Tierney

)

Case No.

)

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2:17-mj-83-1

BY

DEPUTY CLERK

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 10, 2017 in the county of Chittenden in the
 District of Vermont, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 2422(b)

using a facility of interstate commerce to knowingly persuade, induce, entice, or coerce any individual who is not 18 years old to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense

This criminal complaint is based on these facts:

See attached Affidavit of Special Agent Caitlin Moynihan

Continued on the attached sheet.

*Caitlin Moynihan**Complainant's signature*Caitlin Moynihan, Special Agent, HSI*Printed name and title*

Sworn to before me and signed in my presence.

Date: 09/11/2017City and state: Burlington, VermontHon. John M. Conroy, U.S. Magistrate Judge*Printed name and title**Judge's signature*